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Please accept the following comment regarding the South Plateau Landscape Area Treatment project:

October 22, 2022

Citizens for Balanced Use (CBU) is generally in support of the landscape treatment project in the South Plateau area of the Custer Gallatin National Forest. However, we are concerned about further reductions in access opportunities through road closures and obliterations.

We object to the decommissioning of roads 1704B, 2543A, 2543B.

The recreation report states there is no impact to recreation because these roads are currently open to administrative use only. Our concern is the further lack of ability for the Forest Service to manage our public lands if access to these lands is closed. Future fuel reduction projects, search and rescue efforts, fire suppression, weed treatment, and other management activities would be curtailed by road decommissioning and obliteration. CBU supports leaving these current roads in place as important infrastructure.

We oppose closing the east spur of 1756 to motorized wheeled vehicles. Even a short .2 mile of road provides recreation opportunities and dispersed use. This spur provides areas important to hunters, picnickers, wood gathering, etc. All these roads are important to keep open.

We oppose decommissioning roads 1756 and 1752. Again this 1.3-mile section of roads provides access for recreation activities that are important. The Recreation Report inaccurately describes impacts to recreation as temporary and minor. These road closures are not temporary and adversely affect recreation. People who recreate in these areas and on these roads feel they are important and historic. The Recreation Report also makes the following statements: "the project would not affect recreation infrastructure." and "Vegetation management would not create any permanent changes to recreation opportunities in the project area." These statements are false and must be corrected.

Finally, the closure of 478 is unwarranted. The problems associated with road 478 can be mitigated. CBU attended a tour of road 478 after the Forest Service wrongfully obliterated a portion of this road in violation of NEPA. We inspected the erosion problem on a short section of road 478 which can be easily addressed through drainage control ditches and maintenance.

After we brought the wrongful obliteration of this road to the attention of the Forest Service we were promised the road would be put back to its original condition or better. CBU was notified during the week of October 17th that the road was indeed put back in place but remains closed because the surface of the road was damaged during the obliteration and full repair of the road could not be completed. This is unacceptable.

We believe this road was obliterated because the Forest Service had equipment in the area completing the Yellowstone Shortline Trail and used this opportunity to obliterate the road while the equipment was there.

Because road was slated for obliteration in the South Plateau Landscape Area Treatment Project, why not destroy the road while the equipment was in the area and available. This action was unacceptable and road 478 MUST be repaired to the condition prior to obliteration immediately and reopened to the public.

The Recreation Report makes no mention of the impact of losing road 478. This report claims that rerouting traffic from road 478 to roads 6786 and 1704 "is not expected to affect recreationalist" and roads 6786 and 1704 "would therefore present an equivalent recreation opportunity." These statements are false.

Road 478 provides a recreational opportunity second to none in the area. This road provides a scenic opportunity along the South Fork of the Madison River while roads 6786 and 1704 do not. Road 478 provides access to fishing in the South Fork of the Madison along with access to prime hunting opportunities. Many elderlies, handicapped, disabled, and physically challenged individuals use the 478 road to enjoy time with their families including their children and grandchildren. There are camping opportunities accessible from road 478 which would be lost.

The Recreation Report failed to take a hard look and analyze these lost opportunities of closing road 478. CBU requests the Forest Service repair the damage they did to road 478 by putting it back to its original condition or better, mitigate to sedimentation problems, and leave this important and historic road in place.

The Recreation Report lacks in correctly analyzing the impacts of this project to recreation and must be supplemented.

CBU does not believe making permanent changes and amendments to the Travel Plan in a fuels treatment project is appropriate.

Attached are 2 photos of the wrongfully obliterated portion of road 478 and a picture of the portion of road 478 where the road runs along the river. This shows the important recreational value of this road.